

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,

Plaintiff,

v.

Crim. No. 08 CR 10386 PBS

ZHEN ZHOU WU a/k/a ALEX WU,
YUFENG WEI a/k/a ANNIE WEI,
BO LI a/k/a ERIC LEE, CHITRON
ELECTRONICS, INC., and CHITRON
ELECTRONICS COMPANY LIMITED
a/k/a CHI-CHUANG ELECTRONICS
COMPANY LIMITED,

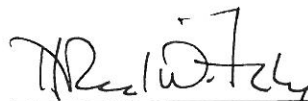
Defendants

NOTICE OF SPECIAL APPEARANCE

TO THE CLERK OF COURT:

Please enter my special appearance for 深圳市驰创电子有限公司, *i.e.*, Shenzhen Chitron Electronics Company Limited ("Shenzhen Chitron"). Shenzhen Chitron, which is not accurately named in the indictment, appears solely for the limited purpose of seeking dismissal for lack of personal jurisdiction and insufficiency of service of process. Attached hereto is the Power of Attorney by Shenzhen Chitron along with a related Certificate. I certify that I am admitted to practice in this Court.

Respectfully submitted,



H. Reed Witherby (BBO #531600)
Smith & Duggan LLP
Two Center Plaza, Suite 620
Boston, MA 02108
(617) 228-4400

June 4, 2009

POWER OF ATTORNEY

May 27, 2009

United States District Court
District of Massachusetts

We, **Shenzhen Chitron Electronics Company Limited**, a entity organized under the laws of the People's Republic of China, with its business address at Room 1916, Huatong Building, 2127 Sungang Road, Luohu District, Shenzhen, China, hereby retain and appoint special litigation counsel in the United States, specifically the Boston, Massachusetts, law firm of Smith and Duggan LLP, and more specifically, Messrs. Garrick Cole, Reed Witherby, and Thomas Herman (hereinafter collectively referred to as "special litigation counsel"), to appear specially in response to the summons and indictment in the case pending in the United States District Court for the District of Massachusetts entitled United States of America v. ZhenZhou Wu, et al., Criminal Docket No. 08-10386-PBS, the first superseding indictment in which charges "Chitron Electronics Co. Ltd. a.k.a. Chi-Chuang Electronics Co., Ltd." with several violations of Titles 22, 18, and 50 of the United States Code on such terms as the firm may require and the General Manager approve.

Said special litigation counsels thus retained are instructed to lodge with the Court an application for dismissal of the indictment for insufficiency of service of process and lack of personal jurisdiction and are further instructed to take no action beyond that authorized without further instruction other than action that special litigation counsel determine necessary to prosecute the company's application for dismissal.

IN WITNESS WHEREOF we cause this Power of Attorney to be duly signed and sealed.


Mr. Rong Liu, General Manager
[Seal of the company]

Shenzhen Chitron Electronics Co., Ltd



廣東廣和律師事務所

GUANGDONG GUANGHE LAW FIRM

深圳市福田區福虹路世貿廣場A座20層

20/F., Block A, World Trade Plaza, Fuhong Rd., Futian District, Shenzhen

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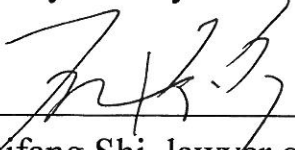
E-mail: webmaster@ghlawyer.net

CERTIFICATE OF FORMAT AND STYLE OF
POWER OF ATTORNEY

I, HUAIFANG SHI, a practicing lawyer of the People's Republic of China, working in Guangdong Guanghe Law Firm, hereby certify that the POWER OF ATTORNEY addressed to United States District Court for District of Massachusetts, dated as of May 27, 2009, signed by Mr. Rong Liu, General Manager of Shenzhen Chitron Electronics Company Limited, over the seal of the company is in proper format and style and in conformity with Chinese law practice as a formal power of attorney addressed to a Chinese court by a litigant to appoint his/her/its agent ad litem or defense counsel.

In Witness Whereof, I execute
this certificate this

27th day of May 2009,



Huaifang Shi, lawyer of
Guanghe Law Firm

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Notice of Special Appearance was filed in open court and served in hand upon all parties on June 4, 2009, and that it is also being filed electronically in compliance with ECF procedures on this day, June 5, 2009, and thus copies will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ H. Reed Witherby
H. Reed Witherby